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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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BRONIQUE BRAITHWAITE-LEWIS,

Docket No.:

Plaintiff,

-against-

NOTICE OF REMOVAL

BJ'S WHOLESALE CLUB, INC.

Defendants.

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**TO THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK:**

Defendant, BJ'S WHOLESALE CLUB, INC., for the removal of this action from the Supreme Court of the State of New York, County of KINGS, to the United States District Court for the EASTERN District of New York, respectfully shows this Honorable Court:

FIRST: Defendant, BJ'S WHOLESALE CLUB, INC., is a defendant in a Civil action brought against it in the Supreme Court of the State of New York, County of KINGS, entitled:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
BRONIQUE BRAITHWAITE-LEWIS,

Index No.: 503926/2021

Plaintiff,

-against-

BJ'S WHOLESALE CLUB, INC.,

Defendant.

-----X

Copies of the Summons, the Complaint, and BJ'S WHOLESALE CLUB, INC.'s Answer are annexed hereto as Exhibit A.

SECOND: That this action seeks recovery for damages sustained as a result of personal injuries allegedly suffered by the plaintiff while on the defendant's premises.

THIRD: The grounds for removal are that this Court has original jurisdiction pursuant to 28 § 1332(a)(1). The amount in controversy exceeds the sum or value of \$75,000, exclusive of interests and costs, and is between citizens of different States.

FOURTH: The defendant, BJ'S WHOLESALE CLUB, INC., is a Delaware Corporation with its corporate headquarters and principal place of business in Massachusetts. Thus, for diversity purposes, the defendant is a citizen of Massachusetts and/or Delaware pursuant to 28 U.S. Code § 1332 (C)(1)

FIFTH: That upon information and belief Plaintiff is a citizen of the State of New York, County of KINGS.

SIXTH: In that this action is between citizens of different states and seeks damages in excess of \$75,000.00, than pursuant to 28 U.S.C.A. § 1332 and 28 U.S.C.A. § 1441 and § 1446

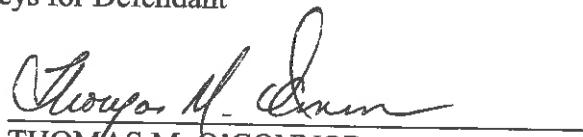
the case should be removed from the Supreme Court of the State of New York, County of KINGS to the United States District Court for the Eastern District of New York.

Dated: Northport, New York
March 19, 2021

Yours, etc.

BRODY, O'CONNOR & O'CONNOR, ESQS.
Attorneys for Defendant

By:



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